

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

SERGEJ LETYAGIN, d/b/a
SUNPORNO.COM, IDEAL CONSULT,
LTD., "ADVERT", "CASTA",
"TRIKSTER", "WORKER", "LIKIS",
"TESTER" and DOES 1-50

Defendants

Case No. _____

FILED UNDER SEAL

**DECLARATION OF ERIKA DILLON IN
SUPPORT OF PLAINTIFF'S *EX PARTE*
MOTION FOR ALTERNATE SERVICE**

I, ERIKA DILLON, hereby declare under penalty of perjury:

1. I am over the age of 18 and am a resident of the state of Nevada.

2. I have personal knowledge of the facts herein, and, if called as a witness, could testify competently thereto.

3. I am employed by Plaintiff Liberty Media Holdings, LLC as an in-house paralegal and online investigator, and this declaration is provided in my capacity as the latter.

4. Upon receipt of the subpoena response from Moniker Online Service, I reviewed the list of Internet Protocol (IP) addresses utilized to access the account. There were several early logins from California IP addresses. The vast majority of the post-2008 IP addresses point to the Czech Republic. There are occasional logins from Amsterdam listed in the data.

1 5. I am familiar with the actions of foreign-based, offshore intellectual property
2 thieves. It is within my knowledge and expertise that a large percentage of intellectual property
3 thieves take active steps to avoid liability for their actions, including, but not limited to,
4 falsifying WHOIS information, providing false physical addresses (if any address is provided at
5 all), and taking other active steps to avoid service.
6

7 6. In the instant case, Defendants originally utilized a privacy protection service
8 through Moniker Privacy Services to mask the information provided for the domain
9 www.sunporno.com. Once this privacy protection was lifted, all registrant contact information
10 referenced "Domain Admin" and Ideal Consult, Ltd., a Seychelles business with a P.O. Box. A
11 true and correct copy of this report is attached to the instant motion as Exhibit B.
12

13 7. Further research of the WHOIS records revealed that the website had previously
14 been publicly listed as belonging to Sergej Letyagin with an address in Gibraltar. A true and
15 correct copy of this report is attached to the instant motion as Exhibit H.
16

17 8. The email address webmaster@nightangel.com is recorded in the WHOIS
18 information attached as Exhibit B as the email point of contact for the SunPorno.com website.

19 9. Upon receipt of Mr. Tucker's declaration (attached as Exhibit A), I performed
20 extensive online research based upon the email address, Skype address, and ICQ number located
21 by Mr. Tucker.
22

23 10. I reviewed the Skype online directories and listings for the Donald_Home address
24 referenced by Mr. Tucker in his Declaration (Exhibit A). I have never communicated with the
25 user Donald_Home, but through a search for the name, I was able to access a public profile
26 listing his location as Prague in the Czech Republic. Upon locating this profile, I performed
27 another search looking for the email address webmaster@nightangel.com. A search for this
28 email address brought up, as the only result, the Skype profile for Donald_Home. A true and

1 correct copy of the Donald_Home profile and the search for webmaster@nightangel.com is
2 attached to the instant motion as Exhibit I.

3 11. I also performed searches utilizing the ICQ number 23834802 Letyagin provided
4 to Mr. Tucker in the email attached to Mr. Tucker's declaration. It is common for individuals
5 utilizing ICQ to add dashes into their ICQ numbers to make them easier to read and copy. This
6 is also done to minimize the impact of searches done for particular ICQ patterns. A search for
7 the ICQ number Letyagin provided to Mr. Tucker hyphenated as "238-348-02" lead to the adult
8 webmaster message board GoFuckYourself.com and the user with the nickname "design." This
9 user identifies their location as "TGPAAlliance.com," the domain for the email address that Mr.
10 Tucker used to correspond with Letyagin.
11
12

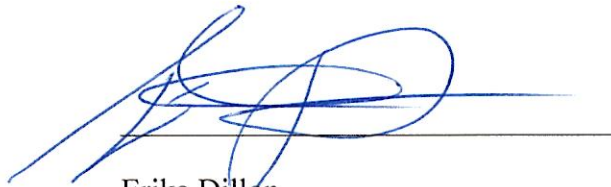
13 12. In a November 2, 2011 post, user design expresses an interest in buying "gay
14 hardlinks," a method of purchasing placement of a URL on another individual's website, for a
15 fee, to drive traffic to the URL. A true and correct copy of this thread from the message board is
16 attached as Exhibit M. This user holds out the email address clipinspector@gmail.com as the
17 preferable method of doing business. The user requested purchasing for "3+ months." Because
18 this email address is held out in a forum of individuals operating a similar business, it would be
19 unlikely that this email address is not monitored for activity and correspondence.
20
21

22 13. In addition to these email addresses, my online research revealed that the
23 SunPorno.com website displays the email address webmaster@sunporno.com at
24 <http://webmasters.sunporno.com/contact.php>. This address is in the section of the SunPorno.com
25 website that allows individuals who own other websites to provide referrals to the SunPorno.com
26 website. A true and correct copy of this page is attached as Exhibit L. Webmasters utilize these
27 exchanges of traffic to drive up hits on their websites, thereby driving up the value and
28 advertising revenue of their websites. These exchanges of traffic are sometimes merely mutually

1 beneficial relationships, but can also often be done for a price. Because this email address is
2 held out as a point of contact for webmasters to utilize, it would be highly unlikely for this email
3 address to not be monitored for activity and correspondence.
4

5 14. Despite locating these additional email addresses, my extensive online research
6 has not revealed any further information about the true location of the Defendant. Despite
7 reaching out to the domain name registrars, to other individuals attempting to stop the rampant
8 piracy of this network of websites (like Mr. Tucker), and performing long-term intensive
9 research on the information available about the SunPorno.com website and Sergej Letyagin,
10 Plaintiff has been unable to determine a true location that would allow traditional service of
11 process upon the Defendants.
12

13
14 Signed this 31st day of May, 2012 in Las Vegas, Nevada.
15

16
17 
18 Erika Dillon